

Top 10 Frequently Asked Regulatory Questions VOLUNTEERS and VOLUNTEER MANAGERS



1. What activities can be included in the 5% cost savings calculation?

CMS allows hospice providers to count direct patient care activities and administrative activities towards the 5% cost savings calculation.

- *Examples of direct patient care services include helping patients and families with household chores, shopping, transportation, and companionship. Examples of direct patient care services include mowing a patient's lawn or walking their dog. The key is that the volunteer has direct contact with the patient and the family.*
- *Volunteers may assist in ancillary and office activities that support direct patient care activities. These duties may include answering telephones, filing, assisting with patient and family mailings, and data entry.*

2. What activities don't count towards the 5% cost savings calculation?

*Hospices may use volunteers in non-administrative and non-direct patient care activities, but CMS has stated that they are **not eligible** for inclusion in the "5 percent" calculation. Some of these activities include:*

- *Craft projects*
- *Quilting/ sewing/knitting*
- *Cooking and baking*
- *Orientation, in-service education*
- *Interdisciplinary team meetings*
- *Board participation and board meetings*
- *Community events (i.e.: health fairs)*

3. How many hours should a volunteer orientation program include?

The federal regulations do not specify a required length of volunteer training, but providers should review state hospice licensure regulations for any related requirements. NHPCO's, Hospice Volunteer Program Resource Manual suggests a 16-hour training program.

4. What content must be included in a volunteer training program?

Regardless of the specific duties a volunteer will perform, orientation training should include:

- *Hospice goals, services and philosophy;*
- *Confidentiality and protection of the patient's and family's rights; Family dynamics, coping mechanisms and psychological issues surrounding terminal illness, death and bereavement;*
- *Guidance related specifically to individual responsibilities.*

Surveyors will also be looking for documented evidence that volunteers (1) are aware of their duties and responsibilities and (2) know to whom they should report before being assigned to a patient and family or given administrative duties.

5. Do all volunteers need to have a criminal background check?

Since volunteers are considered employees, they are included in the criminal background check requirement per the Medicare Hospice CoPs at 418.114.

6. Can a hospice count volunteer travel time towards the 5% cost savings?

If a hospice compensates its staff for travel time, the hospice can also count travel time for volunteers in meeting the 5 percent requirement. Per CMS, "What that means is that if your staff is paid for the time it takes them to drive to a patient's home, then you can count the time it takes for a volunteer to drive to a patient's home. However, if you do not pay an administrative staff for the time it takes to drive to the office, then you cannot count the travel time of the volunteer who drives to an office location to volunteer."

7. Can a hospice treat student interns as volunteers and then use their hours towards the 5% cost savings calculation?

After reviewing the CoP regulatory text and the interpretive guideline language there is lack of detail related to the use of interns as volunteers. Using interns as volunteers and counting their hours towards the 5% would be at your organization's discretion.

8. Can a hospice list a volunteer's visit frequency as PRN?

CMS requires that all disciplines, including volunteers, listed on the patient's plan of care have distinct visit frequencies. Visit ranges are acceptable, but should not have an excessive gap. (ie: 2-3 visits/ week versus 2-6 visits/week) PRN is not an allowable as a standalone visit frequency. PRN can accompany a distinct visit frequency such as 1-2/ month and 2 PRN's. If there is no specified visit frequency for the volunteer, the provider could use a phrase such as, "per patient request" as the frequency on the patient's plan of care.

9. What staff hours can a hospice use when calculating the required 5% cost savings?

To determine how many hours will be required to meet your program's 5 percent requirement, divide the number of hours that hospice volunteers spent providing administrative and/or direct patient care services by the total number of patient care hours of all paid hospice employees and contract staff.

10. Where can a hospice find a volunteer value rate to use in their 5% cost savings calculation?

NHPCO's, Hospice Volunteer Program Resource Manual recommends using the Points of Light Institute (<http://archive.pointsoflight.org/resources/research/calculator.cfm>) or the Independent Sector website (www.independentsector.org/programs/research/volunteer_time.html) to determine volunteer hourly rates.